REMARKS

Reconsideration of this application as amended is respectfully requested.

In the Office Action, claims 1-32 were pending and rejected. In this response, no claim has been canceled. Claims 1-32 have been amended. No new matter has been added.

Claims 1, 4-6, 8-9, 12-14, 16-17, 20-22, 24-25, 28-30 and 32 are rejected under 35 U.S.C. 103(a) as being unpatentable over Chin et al., U.S. Publication No. 2001/002455 ("Chin") in view of Garber, U.S. Patent No. 6,408,270 ("Garber").

Claims 2-3, 7, 10-11, 15, 18-19, 23 and 26-27 are rejected under 35 U.S.C. 103(a) as being unpatentable over Chin et al., in view of Garber and further in view of Komissarchik et al., U.S. Patent No. 5,799,276 ("Komissarchik").

The rejections above do not mention claim 31. It is not sure the status of claim 31. It is assumed that claim 31 is patentable over the cited references.

In view of the foregoing amendments, it is respectfully submitted that claims 1-32 include limitations that are not disclosed by the cited references. Specifically, independent claim 1 as amended includes receiving a search request at a server from a client over a network, where the search request includes one or more search terms. For each search term, the sever identifies all diphthongs of the search term, determines one or more canonical representations for each diphthongs based on pronunciation of each diphthong, where the canonical representations are in a text format. The server further generates one or more

canonical phonetic forms for each search term based on the possible spelling of the one or more canonical representations of each diphthongs, including determining whether there are any canonical representations exist for one or more letters of the search term and including the canonical phonetic forms that exist for one or more letters of each search term. Thereafter, the server performs a phonetic keyword search in a database coupled to the server for each canonical phonetic form of each search term, where the canonical phonetic search is performed based on the canonical phonetic forms generated from the canonical representation of both letters and diphthongs of the search request. It is respectfully submitted that the above limitations are absent from the cited references, individually or in combination.

Rather, Chin is related to multilingual translation from one language to another language (see, Abstract of Chin). Although the office action acknowledged that Chin fails to disclose that the phonetic forms are based on similar pronunciation of the search term, the office action contends that section col. 5, lines 39-64 of Garber discloses such limitation (see, 9/13/2004 Office Action, pages 2-3). Applicant respectfully disagrees.

Garber discloses a look up table to retrieve a phonetic spelling of a keyword phrase by removing all spaces and vowels from the keyword phrase. Specifically, Gerber recites as follows:

> "In addition to a keyword phrase, each entry also contains a phonetic spelling of the keyword phrase. Although a preferred method of formulating phonetic spellings will be described in detail below, the phonetic spellings can potentially be obtained in different ways. One simple formula for converting a keyword phrase to its phonetic equivalent is to simply remove all spaces and vowels, as is illustrated in Table 1."

(Garber, col. 5, lines 43 to 50).

Thus, the phonetic spelling associated with the keyword phrase is not related to the similarity of the pronunciation of the keyword phrase.

Similarly, Komissarchik also fails to disclose or suggest the limitations set forth above. Komissarchik is related to a speech recognition system that translates input speech to text (see, Abstract of Komissarchik). Komissarchik does not receive text as an input (e.g., a search term), convert the text into one or more canonical phonetic forms based on the similar pronunciation of the text, and perform a text search based on the converted canonical phonetic forms. There is no need or motivation of Komissarchik for such processes in a text domain. At most, Komissarchik only searches texts corresponding to the speech. Therefore, for the reasons discussed above, it is respectfully submitted that independent claim 1 is patentable over Chin in view of Garber and Komissarchik.

Furthermore, there is no suggestion within the cited references to combine Chin, Garber, and Komissarchik. Chin and Garber are related to a text-to-text multilingual translation or sorting/searching, while Komissarchik is related to a speech recognition system that converts a speech to text. Chin and Garber do not receive speech as an input and require any speech recognition during the translation and Komissarchik does not receive text as an input when performing speech recognition. It is respectfully submitted that one with ordinary skill in the art would not, based on the teachings of Chin, Garber, and Komissarchik, combine these references, because such a combination lacks a reasonable expectation of success.

Even if they were combined, such a combination still lacks the limitations set forth above. Therefore, it is respectfully submitted that claim 1 is patentable over Chin and Garber in view of Komissarchik.

Similarly, independent claims 9, 17, and 25 include limitations similar to those recited in claim 1. Thus, for the reasons similar to those discussed above, independent claims 9, 17, and 25 are patentable over the cited references.

Given that the reset of the claims depend from one of the above independent claims, at least for the reasons similar to those discussed above, it is respectfully submitted that the rest of the claims are patentable over the cited references.

In addition, with respect to claims 8, 16, 24, and 32, it is not clear the status of claims 8, 16, 24, and 32 from the Office Action. Particularly, the office action stated:

> "As per claims 8-9 and 12-14, these claims are rejected on grounds corresponding to the arguments given above of rejected claims 1-8 and are similarly rejected.
>
> As per claims 16-17, 20-22, and 32, these claims are rejected on grounds corresponding to the arguments given above of rejected claims 1-8 and are similarly rejected."

(5/3/2005 Office Action, pages 3-4, emphasis added).

The office action did not address the limitations in claims 8, 16, 24, and 32. Nevertheless, it is respectfully submitted that claims 8, 16, 24, and 32 include limitations that are not disclosed or suggested by the cited references. Particularly, for example, claim 8 includes limitations of ignoring any character that is not a letter and ignoring a second consecutive appearance of an identical letter when determining the canonical representation of the respective letter of the search term. It is respectfully submitted that these limitations are absent from the cited references. Therefore, in addition to those applied to its independent claim, it is respectfully submitted that claim 8 is patentable over the cited references. Similarly, claims 16, 24, and 32 are also patentable over the cited references.

In view of the foregoing, Applicants respectfully submit the present application is now in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call the undersigned attorney at (408) 720-8300.

Please charge Deposit Account No. 02-2666 for any shortage of fees in connection with this response.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN

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Kevin G. Shao
Attorney for Applicant
Reg. No. 45,095

12400 Wilshire Boulevard
Seventh Floor
Los Angeles, CA 90025-1030
(408) 720-8300